

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 2:12CR63
)	
JEREMY C. CHURCHILL,)	
)	
Defendant.)	

GOVERNMENT’S MOTION TO CONTINUE SENTENCING HEARING

The United States of America, by and through Neil H. MacBride, United States Attorney, and Melissa E. O’Boyle, Assistant United States Attorney, moves to continue the sentencing hearing in this matter for at least ninety (90) days. Defendant JEREMY C. CHURCHILL does not oppose this motion. In support of this motion, the government states as follows:

1. On May 9, 2012, defendant JEREMY C. CHURCHILL entered a plea of guilty to a one-count criminal information before the Honorable United States District Judge Arenda L. Wright Allen. Specifically, defendant pled guilty to violating Title 18, United States Code § 371, conspiracy to commit bank fraud. Defendant’s sentencing hearing is currently scheduled to take place on August 24, 2012.
2. The government moves to continue the sentencing hearing in this matter for at least ninety (90) days. The government respectfully requests this continuance to give the defendant additional time to cooperate with ongoing criminal investigations and prosecutions.
3. Defendant JEREMY C. CHURCHILL does not oppose this motion for a continuance.

Accordingly, the Government moves to continue the sentencing hearing in this matter for at least ninety (90) days beyond the current date of August 24, 2012.

Respectfully Submitted,

Neil H. MacBride
United States Attorney

By: /s/
Melissa E. O'Boyle
Assistant United States Attorney
Virginia State Bar No. 47449
Attorney for the United States
United States Attorney's Office
101 West Main Street, Suite 8000
Norfolk, VA 23510
Office Number - 757-441-6331
Facsimile Number - 757-441-6689
E-Mail Address - Melissa.OBoyle@usdoj.gov

CERTIFICATE OF SERVICE

I certify that on July 31, 2012, I electronically filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Trey R. Kelleter
500 World Trade Center
Norfolk, Virginia 23510
tkelleter@vanblk.com

I further certify that on July 31, 2012, I caused a true and correct copy of the foregoing to be mailed to the following:

Tara R. Gill
U.S. Probation Officer
600 Granby Street, Suite 200
Norfolk, Virginia 23510

/s/

Melissa E. O'Boyle
Assistant United States Attorney
Virginia State Bar No. 47449
Attorney for the United States
United States Attorney's Office
101 West Main Street, Suite 8000
Norfolk, VA 23510
Office Number - 757-441-6331
Facsimile Number - 757-441-6689
E-Mail Address - melissa.oboyle@usdoj.gov